

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Alonzo Workman,
Darlene Workman,

Debtors.

Case No. 22-12357-pmm

Chapter 13

Debtors' Motion to Convert Case to Chapter 7

AND NOW, Debtors Alonzo Workman and Darlene Workman, by and through their attorney, state as follows:

1. The Debtors hereby request that the Court convert this chapter 13 case to a case under chapter 7.

2. Upon conversion of this case, the Court should retain jurisdiction over plan payments in the trustee's possession consistent with *In re Lewis*, 346 B.R. 89 (Bankr. E.D. Pa. 2006) and *In re Sherman*, Bky. 19-17043 (Bankr. E.D. Pa. Mar. 3, 2022).

NOW, THEREFORE, the Debtors ask this Court to grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: February 11, 2024

CIBIK LAW, P.C.
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